

EXHIBIT 3

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK</p> <p>AMERICAN BROADCASTING COMPANIES,) INC., DISNEY ENTERPRISES, INC.,) TWENTIETH CENTURY FOX FILM) CORPORATION, CBS BROADCASTING INC.,) CBS STUDIOS INC., FOX TELEVISION) STATIONS, LLC, FOX BROADCASTING) COMPANY, LLC, NBCUNIVERSAL MEDIA,) LLC, UNIVERSAL TELEVISION LLC, AND) OPEN 4 BUSINESS PRODUCTIONS, LLC,)) PLAINTIFFS,) CASE NO.) 19-cv-7136-LLS v.)) DAVID R. GOODFRIEND AND SPORTS FANS) COALITION NY, INC.,)) DEFENDANTS.)</p> <hr/> <p style="text-align: center;">VIDEOTAPED DEPOSITION OF DEBRA O'CONNELL TAKEN REMOTELY VIA ZOOM VIDEOCONFERENCE MONDAY, DECEMBER 14, 2020</p> <p>Reported by Audra E. Cramer, CSR No. 9901</p> <hr/> <p style="text-align: center;">DIGITAL EVIDENCE GROUP 1730 M Street, NW, Suite 812 Washington, D.C. 20036 (202) 232-0646</p>	<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES OF COUNSEL 2 3 FOR PLAINTIFFS: 4 WILLIAMS & CONNOLLY LLP 5 BY: JOSEPH M. TERRY, ESQUIRE 6 JANE CHONG, ESQUIRE 7 725 12TH STREET, NW 8 WASHINGTON, DC 20005 9 (202) 434-5000 10 jterry@wc.com 11 jchong@wc.com 12 FOR DEFENDANTS: 13 ORRICK, HERRINGTON & SUTCLIFFE LLP 14 BY: ERIN M. B. LEACH, ESQUIRE 15 2050 MAIN STREET, SUITE 1100 16 IRVINE, CALIFORNIA 90401 17 (949) 567-6700 18 eleach@orrick.com 19 20 ALSO PRESENT: 21 BILL GEIGERT, VIDEOGRAPHER 22 GEOFFREY ROBERTS, HOTSEATER</p>
<p style="text-align: right;">Page 2</p> <p>1 VIDEOTAPED DEPOSITION OF DEBRA O'CONNELL, 2 TAKEN REMOTELY VIA ZOOM ON BEHALF OF THE DEFENDANTS, 3 AT 11:07 A.M. EST, MONDAY, DECEMBER 14, 2020, BEFORE 4 AUDRA E. CRAMER, CSR NO. 9901, PURSUANT TO NOTICE. 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p style="text-align: right;">Page 4</p> <p style="text-align: center;">I N D E X</p> <p>1 WITNESS 2 DEBRA O'CONNELL 3 4 5 EXAMINATION PAGE 6 BY MS. LEACH 7 7 (P.M. SESSION) 98 8 BY MR. TERRY 254 9 BY MS. LEACH 260 10 11 12 E X H I B I T S 13 NO. PAGE DESCRIPTION 14 Exhibit 1 77 REQUEST FOR WAIVER ABC0001578 THRU 0001582 15 Exhibit 2 100 WABC COVERAGE MAP ABC0004119 16 Exhibit 3 164 EMAIL CHAIN ABC0000965 THRU 0000967 17 Exhibit 4 187 NEW YORK TIMES ARTICLE ABC0001112 THRU 0001117 18 Exhibit 5 189 EMAIL ABC0001101 THRU 0001103 19 20 21 22</p>

<p style="text-align: right;">Page 149</p> <p>1 just want to make sure I'm answering it</p> <p>2 correctly.</p> <p>3 And your question is as an</p> <p>4 FCC-regulated business...?</p> <p>5 Q. Is ABC required to provide the public a</p> <p>6 free over-the-air broadcast?</p> <p>7 A. Our station -- our stations --</p> <p>8 MR. TERRY: Object --</p> <p>9 THE WITNESS: -- yeah, like WABC, yes,</p> <p>10 as part of our -- that's our FCC license as a</p> <p>11 broadcaster, and as a broadcaster, we offer our</p> <p>12 content free over the air.</p> <p>13 BY MS. LEACH:</p> <p>14 Q. As a part of that FCC license, is the</p> <p>15 public entitled to a free over-the-air broadcast</p> <p>16 from WABC?</p> <p>17 MR. TERRY: Objection to form.</p> <p>18 You can answer.</p> <p>19 THE WITNESS: What was that, Joseph?</p> <p>20 Sorry. I couldn't hear you.</p> <p>21 MR. TERRY: I objected, but I said you</p> <p>22 could go ahead and answer if you can.</p>	<p style="text-align: right;">Page 151</p> <p>1 regarding the contexts of privilege, which is</p> <p>2 what I'm doing.</p> <p>3 So the question asks you why certain</p> <p>4 individuals are being sued. If you know why</p> <p>5 certain individuals and entities are being sued</p> <p>6 as part of the Locast lawsuit aside from</p> <p>7 communications with counsel or things you</p> <p>8 learned through counsel, you can answer it. If</p> <p>9 the question is, "Do you have a beef with</p> <p>10 Locast, and what is it?" you can answer that as</p> <p>11 well.</p> <p>12 But don't reveal anything you learned</p> <p>13 about strategy or rationale or anything from</p> <p>14 counsel.</p> <p>15 THE WITNESS: Thank you.</p> <p>16 Erin, I find it odd that any</p> <p>17 organization would take someone's content</p> <p>18 without having a relationship with them; look to</p> <p>19 affect their business model, especially any</p> <p>20 local television station, who -- as I said</p> <p>21 earlier, I feel like the mission is fairly</p> <p>22 simple: We're here to serve our communities.</p>
<p style="text-align: right;">Page 150</p> <p>1 THE WITNESS: They're entitled to be</p> <p>2 able to have access to -- right? -- meaning over</p> <p>3 the air they can watch Channel 7, WABC, as an</p> <p>4 example of a station, yes.</p> <p>5 BY MS. LEACH:</p> <p>6 Q. Thank you.</p> <p>7 A. Via broadcast. Via over-the-air</p> <p>8 broadcast.</p> <p>9 Q. Without disclosing communications with</p> <p>10 your attorneys, are you able to tell me why ABC</p> <p>11 and Disney Enterprises are suing David</p> <p>12 Goodfriend and Sports Fans Coalition?</p> <p>13 MR. TERRY: Objection to form.</p> <p>14 The witness can't reveal any --</p> <p>15 MS. LEACH: I just asked her to answer</p> <p>16 the question --</p> <p>17 MR. TERRY: I know.</p> <p>18 MS. LEACH: -- if she's able to</p> <p>19 without --</p> <p>20 MR. TERRY: But this question might, by</p> <p>21 its terms, intrude on the privilege, and I'm</p> <p>22 entitled to give the witness an instruction</p>	<p style="text-align: right;">Page 152</p> <p>1 In order to do that, in order to invest</p> <p>2 and reinvest in news coverage and content and</p> <p>3 the number of hours and community events and</p> <p>4 even our talent, who's the voice of our</p> <p>5 communities and who host hundreds of charity</p> <p>6 events, even in the virtual state of today as</p> <p>7 well as the previous and what will be the</p> <p>8 post-pandemic, you know, in person, I just -- I</p> <p>9 don't understand why someone would think that</p> <p>10 that's okay to do, quite honestly.</p> <p>11 You know, just take your signal and</p> <p>12 look to -- look to, first of all, put it out in</p> <p>13 a format that doesn't have the content creator</p> <p>14 or the business owner have any kind of control</p> <p>15 of quality; that they can ask our viewers for</p> <p>16 donations.</p> <p>17 We don't ask people for donations.</p> <p>18 They have a choice: They can watch us over the</p> <p>19 air, they can watch us free on our websites, or</p> <p>20 they can buy a multichannel subscription through</p> <p>21 a distributor of any sense.</p> <p>22 My understanding -- and even just</p>

<p style="text-align: right;">Page 277</p> <p>1 Q. Okay.</p> <p>2 A. You know, those are typically reserved</p> <p>3 for, like, a monthly meeting.</p> <p>4 Q. A monthly meeting?</p> <p>5 A. Meaning when I do meeting notes, it's</p> <p>6 not for a meeting that happens twice a week.</p> <p>7 Q. What about -- you said you meet with --</p> <p>8 well, I guess, granted, it's only been this</p> <p>9 month that you've met monthly with the other</p> <p>10 station.</p> <p>11 Did you keep meeting notes for that</p> <p>12 meeting?</p> <p>13 A. No. No, I did not. But I -- well,</p> <p>14 meaning yes, my own notes in my notebook. But</p> <p>15 they're just quick highlights, follow-up items,</p> <p>16 things like that.</p> <p>17 Q. Okay. So, like, not formal minutes?</p> <p>18 A. Not formal minutes, no.</p> <p>19 MS. LEACH: All right. Well, I don't</p> <p>20 have any further questions, and I do appreciate</p> <p>21 your time.</p> <p>22 THE WITNESS: Of course.</p>	<p style="text-align: right;">Page 279</p> <p>1 STATE OF CALIFORNIA)</p> <p>2 COUNTY OF LOS ANGELES) SS.</p> <p>3</p> <p>4 I, AUDRA E. CRAMER, CSR No. 9901, in and for the</p> <p>5 State of California, do hereby certify:</p> <p>6 That, prior to being examined, the witness named</p> <p>7 in the foregoing deposition was by me duly sworn to</p> <p>8 testify the truth, the whole truth and nothing but the</p> <p>9 truth;</p> <p>10 That said deposition was taken down by me in</p> <p>11 shorthand at the time and place therein named, and</p> <p>12 thereafter reduced to typewriting under my direction,</p> <p>13 and the same is a true, correct and complete transcript</p> <p>14 of said proceedings;</p> <p>15 I further certify that I am not interested in the</p> <p>16 event of the action.</p> <p>17 Witness my hand this ____ day of _____,</p> <p>18 2020.</p> <p>19 _____</p> <p>20 Certified Shorthand</p> <p>21 Reporter for the</p> <p>22 State of California</p>
<p style="text-align: right;">Page 278</p> <p>1 MR. TERRY: I don't have any more</p> <p>2 questions either. Thank you.</p> <p>3 THE VIDEOGRAPHER: Okay. That</p> <p>4 concludes today's deposition. The time is</p> <p>5 7:59 p.m.</p> <p>6 (Whereupon, at 7:59 p.m. EST</p> <p>7 the deposition of DEBRA O'CONNELL</p> <p>8 was adjourned.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">Page 280</p> <p>1 Debra O'Connell, c/o</p> <p>2 WILLIAMS & CONNOLLY LLP</p> <p>3 725 12TH STREET, NW</p> <p>4 WASHINGTON, DC 20005</p> <p>5</p> <p>6 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al.</p> <p>7 Date of deposition: December 14, 2020</p> <p>8 Deponent: Debra O'Connell</p> <p>9</p> <p>10 Please be advised that the transcript in the above</p> <p>11 referenced matter is now complete and ready for signature.</p> <p>12 The deponent may come to this office to sign the transcript,</p> <p>13 a copy may be purchased for the witness to review and sign,</p> <p>14 or the deponent and/or counsel may waive the option of</p> <p>15 signing. Please advise us of the option selected.</p> <p>16 Please forward the errata sheet and the original signed</p> <p>17 signature page to counsel noticing the deposition, noting the</p> <p>18 applicable time period allowed for such by the governing</p> <p>19 Rules of Procedure. If you have any questions, please do</p> <p>20 not hesitate to call our office at (202)-232-0646.</p> <p>21</p> <p>22 Sincerely,</p> <p>Digital Evidence Group</p> <p>Copyright 2020 Digital Evidence Group</p> <p>Copying is forbidden, including electronically, absent</p> <p>express written consent.</p>

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 4 (202) 232-0646

5 SIGNATURE PAGE
 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al.
 6 Witness Name: Debra O'Connell
 Deposition Date: December 14, 2020

7 I do hereby acknowledge that I have read
 8 and examined the foregoing pages
 9 of the transcript of my deposition and that:

10 (Check appropriate box):
 11 () The same is a true, correct and
 complete transcription of the answers given by
 me to the questions therein recorded.
 12 () Except for the changes noted in the
 attached Errata Sheet, the same is a true,
 13 correct and complete transcription of the
 answers given by me to the questions therein
 14 recorded.

15
 16
 17 _____
 DATE WITNESS SIGNATURE

18
 19
 20
 21 _____
 22 DATE NOTARY

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5
 6 ERRATA SHEET

7
 8 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al.
 9 Witness Name: Debra O'Connell
 10 Deposition Date: December 14, 2020

11 Page No. Line No. Change

12
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 Signature Date

71 (Pages 281 to 282)